

Counsel's Good Faith Statement for R. 11(b) of certain operative facts made known to him for this filing:

- a. Counsel was contacted by a close friend of defendant Minsky on the late afternoon of Tuesday, May 13, 2025 to provide his legal assistance in this matter;
- b. The Docket of this case states that an answer to the pleading must be filed by May 14, 2025;
- c. Counsel reviewed the pleading and the purported service of process filed herein;
- d. Counsel was advised, and has no basis on which to question, that:
 - i. Mr. Minsky does not reside in the New York state community at which Unit 31 is located;
 - ii. Mr. Minsky does not have a "Care Taker", either the named Ms. Romanska or anyone else;
 - iii. Ms. Romanska is known to be employed directly by the residential community in which Unit 31 is located as a 'property manager' to the entirety of these residences;
 - iv. Ms. Romanska has no affiliation – be it personal or professional – in any manner with Mr. Minsky or any relations at the Unit 31.
- e. Counsel has not spoken with Mr. Minsky at the time this filing was required, but in his absence or unavailability is acting in his interest solely for the purpose of justice for him and to carry out the stated goals of the Civil Procedural Rules.